

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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PETER LORA, VICTORIA BLOOM, et al.,

Plaintiffs,

vs. Case No. 1:07 CV 2787

DEAN BOLAND,

Defendant.

~~~~~

Deposition of
VICTORIA BLOOM

March 3, 2009
9:00 a.m.

Taken at:

Law Office of Jonathan E. Rosenbaum, Esq.

230 Third Street
Elyria, Ohio

Donnalee Cotone, RPR, CLR

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1 APPEARANCES:

2

3 On behalf of the Plaintiffs:

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21

22 ALSO PRESENT:

23 Peter Lora

24

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1 I N D E X

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3 EXAMINATION OF VICTORIA 4 6

4 BLOOM

5 BY MR. BOLAND

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1 VICTORIA BLOOM, of lawful age,
2 called for examination, as provided by the
3 Federal Rules of Civil Procedure, being by me
4 first duly sworn, as hereinafter certified,
5 deposed and said as follows:

6 EXAMINATION OF VICTORIA BLOOM

7 BY MR. BOLAND:

8 Q. Okay. Ma'am, if you could please
9 state your name and spell your last name for
10 the record.

11 A. Victoria Bloom. B-L-O-O-M.

12 Q. And I don't want to know the
13 contents of it, but have you had a conversation
14 with Mr. Rosenbaum about what we're doing, what
15 we're here for today?

16 A. Yes.

17 Q. I'm going to ask not too many
18 questions. I have a few on my computer and a
19 few on this piece of paper, but if there's any
20 question that you don't understand, please let
21 me know that. I'm going to assume if you
22 answered the question, you understood what I
23 was asking, all right?

24 A. Okay.

25 Q. Could you give your -- I'm not

1 going to go over too many of the same questions
2 that we asked just to be written questions just
3 to be efficient.

4 Is there anything about those
5 interrogatories that since the time you wrote
6 those answers that you need to change or add
7 anything to?

8 A. No.

9 Q. Okay. And the requests that were
10 made for productions of documents, are there
11 any new documents that you've come across that
12 are responsive to those requests that you know
13 of?

14 A. You're talking about the
15 information that we were to provide?

16 MR. ROSENBAUM: I think he wants to
17 know in addition to that.

18 Q. Anything in addition to that?

19 A. No.

20 Q. That's all. And any of the
21 admissions, that's the third category of
22 information in those interrogatories, are there

23 any of those now that you feel looking back on
24 those answers that you need to change or add to
25 in any way?

6

1 A. No.
2 Q. I'm going to talk to you about how
3 you first came to know that there was any
4 image, as far as you were told, that involved a
5 minor that was related to you.
6 In fact, for the record, which one
7 of the minor plaintiffs are you the guardian of
8 for the purposes of this case? What's her name
9 or his name? I don't even --
10 A. [Edited for filing] dmb
11 Q. And how are you related to [Edited for filing]dmb?
12 A. I'm her [Edited for filing]dmb.
13 Q. Okay. And how old is [Edited for filing]dmb now?
14 A. [Edited for filing]dmb.
15 Q. And is she aware that this
16 litigation is going on?
17 A. No.

18 Q. Is she aware of -- have you
19 discussed anything about this case or these
20 images with her?

21 A. No.

22 Q. Okay. Has anyone else, as far as
23 you know, discussed this case with her?

24 A. No.

25 Q. Or the existence of any court

1 exhibits?

2 A. No.

3 Q. Okay. And do you intend to keep it
4 that way in the future?

5 A. As best of my abilities.

6 Q. Okay. And in this case, your
7 allegation in the complaint is that court

8 exhibits were made that involve an image of
9 [Edited for filing]dmb, correct?

10 A. Correct.

11 Q. Is that fair to say?

12 Okay. And do you know how many --

13 how many court exhibits are you alleging were

14 created that involve a portion of [Edited for filing]dmb's

15 image?

16 A. One.

17 Q. And how was that court exhibit

18 used? What are you alleging, how that was

19 used?

20 A. What I was told, it was used in

21 quite a few different trials and that they were

22 being used in training some sorts of photoshop

23 training classes.

24 Q. Okay. And who told you that?

25 A. Mike Sullivan.

1 Q. Mike Sullivan. And that's the

2 Assistant United States Attorney for the

3 Northern District of Ohio?

4 A. Yes.

5 Q. The prosecutor.

6 And what training seminars did he

7 tell you they were being used in? What cities?

8 First let's start there. What city was a

9 training seminar occurring where an image of

10 [Edited for filing]dbm was being used?

11 A. To the best of my knowledge, it was

12 in Ohio, but I couldn't tell you the exact

13 places.

14 Q. Now, is it that Mr. Sullivan never

15 told you the exact cities, or that he told you

16 those cities but you just can't recall today?

17 A. I can't recall them.

18 Q. But Mr. Sullivan would probably

19 know what cities those were, is that --

20 A. I couldn't tell you that.

21 Q. Okay. And Mr. Sullivan, Mike

22 Sullivan, also told you that these were being

23 used in courtrooms. Did he say which

24 courtrooms this court exhibit involving [Edited for filing]dbm

25 was used?

1 A. He did, and I don't recall those,
2 but I probably have them written down
3 somewhere.

4 Q. Well, there's a bunch listed in the
5 complaint. Are there other courtrooms besides
6 the ones listed in the complaint that you're
7 aware of where this exhibit involving [Edited for filing]dmb
8 might have been used?

9 A. No.

10 Q. And do you know in the -- in the
11 court cases that are mentioned in the complaint
12 whether an exhibit involving [Edited for filing]dmb was
13 actually displayed in the courtroom in those
14 cases?

15 A. Yes.

16 Q. In which ones?

17 A. I don't recall the date -- the
18 names or the places.

19 Q. Okay. Very well. That's fine.

20 And how -- when did you-- you
21 mentioned in the interrogatories, I believe,
22 that you first knew of a court exhibit that was
23 being used anywhere in the United States

24 involving a portion of [Edited for filing]dmb's image in
25 October of 2004.

10

1 Do you remember giving that

2 answer --

3 A. Yes.

4 Q. -- in the interrogatories?

5 A. Yes.

6 Q. So I'm going to break this up into

7 sort of three different points in time. Prior

8 to October of 2004, when you were told that an

9 exhibit that was being used somewhere, do you

10 have any -- had you suffered, you personally,

11 any damages from any conduct like you allege in

12 the complaint prior to October of 2004?

13 A. No.

14 Q. Okay. Between October of 2004 and

15 today, can you describe for me what harm has

16 come to you personally from the conduct that's

17 alleged in the complaint?

18 A. Terrible angst, fear for the future

19 of the consequences for [Edited for filing]dmr.

20 Q. What --

21 A. Disrespect for mankind.

22 Q. What consequences are you afraid

23 for for the future for [Edited for filing]dmr?

24 A. That she would somehow find out

25 about it or that someone that she knows would

1 see it.

2 Q. Okay. And do you know -- this

3 isn't mentioned in the complaint, but do you

4 know where copies of this exhibit involving

5 [Edited for filing]dmr are located right now? Who has copies

6 of them?

7 A. I wished I did know.

8 Q. Okay. Do you know, do you have a

9 list in your mind or written down anywhere of

10 where copies of this might be?

11 A. In my mind, I picture them being in

12 your hands and in different courts throughout

13 the United States hands, and who knows from
14 those courts who could have got a hold of them.

15 Q. And do you have any information
16 that I -- that I'm still in possession of a
17 copy of any exhibit involving a portion of
18 [Edited for filing]dmb's image?

19 A. No.

20 Q. Okay. And other than those courts,
21 can you tell me who else might have a copy of
22 an exhibit that was created as part of these --
23 what you allege in the complaint, who else
24 beside a court personnel might have a copy of
25 that exhibit?

1 A. In my mind, anybody that was
2 working in that court could have got a hold of
3 it, plus the FBI. They probably have copies of
4 it.

5 Q. And outside of court personnel and
6 the FBI, can you identify anyone else who might
7 have a copy of that exhibit?

8 A. No.

9 Q. Okay. Now, from today going
10 forward, what are the damages that you're
11 claiming will occur to [Edited for filing]dmb as a result of
12 the creation of this exhibit?

13 A. Psychological damages.

14 Q. And how would those come about?

15 A. If anybody that she knew or she saw
16 those images.

17 Q. And in the interrogatories, you
18 gave me a list of people that you have told
19 about the existence of these images. Do you
20 remember giving those answers?

21 A. Yes, I do.

22 Q. Is there anyone else that you need
23 to add on to that list?

24 A. No, I don't.

25 Q. And those people, who have they

2 A. Nobody that I know of. They all
3 promised that they wouldn't.

4 Q. Okay. And other than those people
5 that you told, is there anyone else that you
6 have information that might know? So we have
7 court personnel, the FBI, and people you've
8 told. Is there anyone else out of those three
9 groups other than those three that you're aware
10 of that knows about the existence of those
11 images?

12 A. No. No.

13 Q. Okay. Now, one of the questions in
14 the interrogatories that you responded to was
15 that you had suffered -- let me back that up
16 for a second.

17 I asked you about various
18 categories of damages. And my recollection
19 is -- and I'm not trying to play a guessing
20 game. I'll pull it up just to be sure -- but
21 that you don't have -- you have not suffered
22 any damages in this matter except for
23 financial. Is that accurate?

24 A. No.

25 Q. Okay. What other damages besides

1 financial damage have you suffered as a result
2 of the conduct alleged in the complaint?

3 A. Psychological.

4 Q. Okay. Can you describe what you
5 mean by psychological damages?

6 A. Because it's caused me great amount
7 of anxiety and fear that I can bring up right
8 now. Remember.

9 Q. And you don't have -- the anxiety
10 and fear you talked about, you discussed with a
11 counselor, right?

12 A. Yes, I have.

13 Q. And that's a counselor that you're
14 already seeing prior to --

15 A. Yes.

16 Q. -- October of 2004? And what was
17 the reason you're seeing the counselor?

18 A. It's personal.

19 Q. So in this case you're claiming

20 psychological injury, so I'd like to know why

21 you're seeing the counselor.

22 A. It has nothing to do with the case.

23 Q. Are you refusing to answer the

24 question.

25 MR. ROSENBAUM: Answer.

15

1 MR. LORA: I can leave if you're

2 not comfortable.

3 A. Because of difficulties with my

4 daughter, who is a drug addict.

5 Q. Does your daughter live with you?

6 A. No.

7 Q. Okay. Is she the mother of

8 [Edited for filing]dmb?

9 A. Yes.

10 Q. And for how long prior to October

11 of 2004 have you been seeking psychological

12 counseling?

13 A. Me personally?

14 Q. Yes. Just you.

15 A. Not very long. Maybe a couple of
16 months.

17 Q. And how many times have you
18 discussed with that counselor your anxiety and
19 psychological effects of what you're alleging
20 in the complaint?

21 A. Probably seven or eight.

22 Q. Seven or eight times?

23 A. Yeah. I guess at that.

24 Q. And what's the cost per session for
25 you to see the psychologist?

16

1 A. My -- it's covered by my insurance,
2 except for \$30 copay.

3 Q. And the seven or eight times that
4 you've discussed the allegations in this
5 complaint with that psychologist, would that
6 discussion have taken up the entire session
7 that you were with the psychologist?

8 A. The majority of it.

9 Q. And how long are those sessions

10 typically?

11 A. An hour.

12 Q. So about seven or eight hours of

13 time with a psychologist has been -- has

14 involved this discussion of the allegations in

15 this case?

16 A. Yes.

17 Q. Okay. Now, you haven't suffered

18 any physical injury related to the allegations

19 in the complaint, correct?

20 A. No.

21 Q. And you did indicate in your

22 responses that you suffered some financial

23 injury. Can you describe that, please.

24 A. I believe that might have -- that

25 was in -- not me. That was my son that put the

1 picture on there; put the picture on the

2 Internet in the first place. I might have

3 answered that wrong.

4 Q. That's okay. Maybe I'm confusing
5 the answers. There was a thing called a
6 request for admission. Let me just make sure
7 it was you or not. Right. And I'm looking at
8 your answers here, and in one of them -- and
9 maybe I'm misreading it, so I'm going to just
10 to go ahead and --

11 Okay. There was a request for
12 admission, and I asked you this question:

13 No, maybe I didn't ask it.
14 Have you suffered any financial
15 injury related to the allegations, you,
16 yourself, related to the conduct alleged in the
17 complaint?

18 A. No.

19 Q. Okay. There was a question,
20 though, where I asked about [Edited for filing]dmb. Has she
21 suffered -- I asked you to admit that she has
22 not suffered any financial injury from the
23 allegations in the complaint, and you denied
24 that.

25 So can you please describe for me

1 the financial damage [Edited for filing]dmb has suffered since
2 October 2004 to now. What financial damage has
3 she suffered as a result of the conduct that
4 you allege in the complaint?

5 A. She hasn't.

6 Q. And she suffered no psychological
7 injury, correct?

8 A. No.

9 Q. Actually, no injury whatsoever has
10 she currently suffered?

11 A. Not currently, no.

12 Q. Currently. She might suffer in the
13 future, is that your contention?

14 A. Yes.

15 Q. How about prior to October of 2004.

16 Prior to you getting a visit from the FBI and
17 them telling you about these exhibits with
18 [Edited for filing]dmb somehow involved, prior to that had she
19 suffered any injury at all regarding -- as a
20 result of the conduct you allege in the

21 complaint?

22 A. No.

23 Q. In October of 2004, how was it that

24 you were informed about a court exhibit that

25 might involve [Edited for filing]dmb? On the phone? E-mail?

19

1 In person?

2 A. In person.

3 Q. And who -- where did that take

4 place, at your home?

5 A. It took place at my workplace. And

6 Mike Sullivan and Debra Hughes came there and

7 explained it to me.

8 Q. This can be kind of tricky because

9 there's two Sullivans here. I just want to

10 make sure. There's a Charlie Sullivan.

11 A. Oh, Charlie Sullivan. I'm sorry.

12 Q. Yeah. And that gets confusing

13 because their names are the same. So Charlie

14 Sullivan, the FBI agent, and Debra Hughes came

15 to your workplace?

16 A. Yes.

17 Q. And where is that that you work?

18 A. American Greetings.

19 Q. And did they make an appointment to

20 come and see you or did they just show up at

21 the desk and they called you down?

22 A. They called me to meet me there.

23 Q. You knew they were coming?

24 A. Yes.

25 Q. And how long were they there

20

1 meeting with you in that occasion in October of

2 04?

3 A. Oh, maybe 40, 45 minutes.

4 Q. All right. And when they showed up

5 there, who did the talking to discuss why they

6 were there?

7 A. They both did.

8 Q. And what did they tell you? Why

9 were they there?

10 A. They explained to me the use of the
11 image and discussed -- well, that brought along
12 fear right there, that there could be some
13 repercussions of it. And so Debra Hughes was a
14 witness kind of person that told me not -- you
15 know, I don't know how to explain that. They
16 gave me this little card so that I can get on
17 the Internet so I can check and see what the
18 status of everything is. And I was afraid that
19 there could be some damages or some --

20 Q. Hold on a second. What's the card?

21 What are you referring to by a "card"?

22 A. It's a card -- here. It's a victim
23 notification system.

24 Q. I see. And it would allow you to
25 track what was happening --

1 A. What was happening.

2 Q. -- in their investigation?

3 A. Yes.

4 Q. Okay. And what did they tell you
5 they were investigating?

6 A. The person that downloaded images
7 and used them for pornographic reasons.

8 Q. And did they explain to you how
9 those -- how [Edited for filing]dmb was involved in some type
10 of an image, her image?

11 A. Yes.

12 Q. And did they tell you it was for
13 someone's personal use or they were
14 using it --

15 A. They said they were investigating
16 it.

17 Q. They didn't say what it was for?

18 A. They knew some of the things that
19 it was used for.

20 Q. What did they tell you it was being
21 used for?

22 A. That they were being used in courts
23 and training classes.

24 Q. Charlie Sullivan told you it was
25 being used in training?

1 A. Yes.

2 Q. Okay. And did they show you any
3 images during that meeting?

4 A. They showed me the original image
5 and described. I didn't want to see the other
6 one.

7 Q. Did they offer to show you the
8 court exhibit that was created?

9 A. They said they could if I chose to
10 look at it, but I didn't want to.

11 Q. And did they have it with them
12 there?

13 A. I don't know if they had it with
14 them there or not.

15 Q. Okay. So you've never actually
16 seen any court exhibit like the ones that are
17 described in the complaint?

18 A. No.

19 Q. You had the court exhibit described
20 to you by Charlie Sullivan?

21 A. Yes.

22 Q. Anyone else describe the exhibit to

23 you at any point?

24 A. In paperwork that I'm not sure

25 where I got from --

23

1 Q. Okay.

2 A. -- there's descriptions of it.

3 Q. And has anyone else that you've

4 told about this case occurring, have they seen

5 a copy of the court exhibit --

6 A. No.

7 Q. -- that you're alleging in the

8 complaint? No?

9 A. (Witness shaking head in the

10 negative.)

11 Q. Okay. And have you described this

12 court exhibit to those other people that you

13 listed in your --

14 A. Yes.

15 Q. -- discovery responses?

16 A. Yes.

17 Q. Okay. And do you have any way of
18 knowing whether Charlie Sullivan's description
19 to you is accurate?

20 A. By the descriptions in the court
21 papers.

22 Q. I'm saying, you've never seen the
23 image to know if Charlie Sullivan is telling
24 you accurately what that image looks like?

25 A. No.

24

1 Q. Okay. Now, who put the -- any
2 image of [Edited for filing]dmb on sale on the Internet
3 anywhere? Do you know who that might be?

4 A. It was my son.

5 Q. And what's his name?

6 A. Ron Bloom.

7 Q. Where does Ron live?

8 A. On Bosworth in Cleveland.

9 Q. And Ron doesn't have custody of
10 [Edited for filing]dmb either, correct?

11 A. No. It's an uncle. He's [Edited for filing]dmbs

12 uncle.

13 Q. And did you have custody of [Edited for filing]dmbs

14 at the time that image or any image was taken

15 of [Edited for filing]dmbs and uploaded to the Internet?

16 A. Yes.

17 Q. You did?

18 A. Yes.

19 Q. And did you give permission for Ron

20 to take that picture?

21 A. Yes.

22 Q. Did you give permission for him to

23 put it on the Internet?

24 A. Yes.

25 Q. Where -- what locations on the

1 Internet was that image placed?

2 A. iStock.

3 Q. Anywhere else?

4 A. Not that I'm aware of.

5 Q. And how many -- you answered in the
6 interrogatories it was sold about five times,
7 the copy?

8 A. Well, I have a paper and it was
9 nine.

10 Q. Nine. Very well.

11 A. Nine times.

12 Q. And who got the money from the sale
13 of those nine copies of the image?

14 A. Ron.

15 Q. Are there other pictures other than
16 the one that was used in the court exhibit of
17 [Edited for filing]dbm that are available -- that have ever
18 been available online to purchase?

19 A. Yes.

20 Q. Are they still available online to
21 purchase?

22 A. A few of them. Ones that we went
23 through that -- thought that there was more
24 than one person in it or that they couldn't be
25 manipulated in the wrong way.

1 Q. And where are those images of

2 [Edited for filing]dmb still available online?

3 A. iStock.

4 Q. And other than purchases related to

5 this case, have other persons, even if you

6 don't know their identity, purchased copies of

7 the image that was referenced in this

8 complaint?

9 A. Nine.

10 Q. Nine other people. And how have

11 they -- those nine other people used that

12 image?

13 A. I don't know.

14 Q. Have you suffered any damages from

15 how those other people might have used that

16 image?

17 A. No.

18 Q. Do you know the identities of those

19 people?

20 A. No.

21 Q. Are they in the United States, do

22 you know? Do they live in the United States?

23 A. No, I don't know that.

24 Q. Okay. And how many different

25 images of [Edited for filing]dmb has Mr. Ron Bloom put on the

27

1 Internet for sale?

2 A. I don't know.

3 Q. And the money goes to him?

4 A. Yes.

5 Q. Okay. Is [Edited for filing]dmb aware that these

6 images captured by her uncle have been put on

7 the Internet for sale?

8 A. Yes. Yes.

9 Q. And how was she aware of that?

10 A. Because he took the images and told

11 her that he was putting them on the Internet.

12 And they've seen them on the Internet.

13 Q. They have?

14 A. Yes.

15 Q. Can you tell me the commercial

16 value of any -- of the image of [Edited for filing]dmb that

17 you're alleging was used in a court exhibit in
18 this case? What's its commercial value? What
19 can it be sold for on the Internet, the image
20 that you guys uploaded?

21 A. I honestly can't answer that
22 question because I really never got involved in
23 the sale -- you know, prices of the sales.
24 Q. Does [Edited for filing]dmb have any income
25 currently in 2009? Does she earn income from

1 any kind of job?
2 A. No.
3 Q. Has she ever, from 2004 to now,
4 earned income in some way?

5 A. No.
6 Q. She's not an actress?

7 A. No.
8 Q. She's not a child model?

9 A. No.
10 Q. I would assume she's just a typical
11 kid going to school doing whatever they do,

12 right?

13 A. No.

14 Q. She's not a movie star?

15 A. No.

16 Q. Or singer or professional of any

17 kind, correct?

18 A. No.

19 Q. All right. I might have asked you

20 this one question, and so if I repeat it, I

21 apologize. But I asked you to admit that

22 [Edited for filing]dmb has suffered no financial injury as a

23 result of the conduct alleged in the complaint,

24 and in your responses you denied that.

25 So just -- if I asked you before I

1 apologize, but what's the dollar amount of the

2 financial injury that [Edited for filing]dmb has suffered as a

3 result of the conduct alleged in the complaint?

4 A. None.

5 Q. And she's -- has she suffered any

6 damage to her reputation?

7 A. That's to see, I guess.

8 Q. I mean, currently, as of today.

9 A. No.

10 Q. Okay. And no physical injury,

11 correct?

12 A. No. Correct.

13 Q. As of today?

14 A. Correct.

15 Q. And as of today, no psychological

16 injury has she suffered?

17 A. Correct.

18 Q. And your financial injury as of

19 today has been none. Is that accurate or no?

20 I'm not trying to trick you.

21 I guess I should ask it that way.

22 Please give me the dollar amount of the

23 personal injury you've suffered.

24 A. None.

25 Q. And your psychological injury is

1 the seven or eight sessions, the cost of those
2 sessions talking to your psychologist about
3 this incident?

4 A. If we're talking about financial,

5 yes.

6 Q. And how -- and that's the \$30 copay
7 times seven or eight sessions, correct?

8 A. Correct.

9 Q. And the first person to ever let
10 you know -- well, let me back that up.

11 You didn't suffer any, yourself,
12 psychological injury related to this prior to
13 October of 2004 when the FBI told you about
14 these exhibits?

15 A. No.

16 MR. BOLAND: Okay. I don't think I
17 have any further questions, Mr. Rosenbaum.

18 MR. ROSENBAUM: Okay.

19 MR. BOLAND: If you want to tell
20 her about her option to review that.

21 MR. ROSENBAUM: You have the right
22 to review a copy of that to make sure that the
23 reporter has accurately taken down your

24 answers, or you can waive that right if you

25 want to.

31

1 THE WITNESS: Well, I would like to

2 review it.

3 MR. BOLAND: This is off the

4 record.

5

6 (Deposition concluded.)

7 - - - - -

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1 CERTIFICATE

2 The State of Ohio,)

3 SS:

4 County of Cuyahoga.)

5

6 I, Donnalee Cotone, a Notary Public

7 within and for the State of Ohio, duly

8 commissioned and qualified, do hereby certify

9 that the within named witness, VICTORIA BLOOM,

10 was by me first duly sworn to testify the

11 truth, the whole truth and nothing but the

12 truth in the cause aforesaid; that the

13 testimony then given by the above-referenced
14 witness was by me reduced to stenotype in the
15 presence of said witness; afterwards
16 transcribed, and that the foregoing is a true
17 and correct transcription of the testimony so
18 given by the above-referenced witness.

19 I do further certify that this
20 deposition was taken at the time and place in
21 the foregoing caption specified and was
22 completed without adjournment.

23
24
25

33

1 I do further certify that I am not
2 a relative, counsel or attorney for either
3 party, or otherwise interested in the event of
4 this action.

5 IN WITNESS WHEREOF, I have hereunto
6 set my hand and affixed my seal of office at

7 Cleveland, Ohio, on this _____ day of
8 _____, 2009.

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14 Donnalee Cotone, Notary Public

15 within and for the State of Ohio

16

17 My commission expires February 7, 2012.

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6 The deposition of VICTORIA BLOOM,

7 taken in the matter, on the date, and at the

8 time and place set out on the title page

9 hereof.

10 It was requested that the

11 deposition be taken by the reporter and that

12 same be reduced to typewritten form.

13 It was agreed by and between

14 counsel and the parties that the Deponent will

15 read and sign the transcript of said

16 deposition.

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1 AFFIDAVIT

2 The State of Ohio,)

3) SS:

4 County of Cuyahoga)

5

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7

8 Before me, a Notary Public in and for

9 said County and State, personally appeared

10 VICTORIA BLOOM, who acknowledged that he/she

11 did read his/her transcript in the

12 above-captioned matter, listed any necessary

13 corrections on the accompanying errata sheet,

14 and did sign the foregoing sworn statement and

15 that the same is his/her free act and deed.

16 In the TESTIMONY WHEREOF, I have hereunto

17 affixed my name and official seal at this_____

18 day of _____ A.D. 2009.

19

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Notary Public

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24

My Commission Expires:

36

1 DEPOSITION ERRATA SHEET

2

3 RE: PETER LORA, VICTORIA BLOOM, ET AL.,

4 VS. DEAN BOLAND

5

6

7 Job No.: 19023-DLC

8 Deponent: VICTORIA BLOOM

9 Deposition Date: MARCH 3, 2009

10

11 To the Reporter:

12 I have read the entire transcript of my

13 Deposition taken in the captioned matter or the

14 same has been read to me. I request that the
15 following changes be entered upon the record
16 for the reasons indicated. I have signed my
17 name to the Errata Sheet and the appropriate
18 Certificate and authorize you to attach both to
19 the original transcript.

20

21

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23

24 _____

25 VICTORIA BLOOM